

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

IN RE: AQUEOUS FILM-FORMING FOAMS  
PRODUCTS LIABILITY LITIGATION

Master Docket No.: 2:18-mn-2873-RMG

**This document relates to:**  
See Exhibit A Attached Hereto

**STIPULATION OF DISMISSAL WITH PREJUDICE PURSUANT TO FEDERAL RULE  
OF CIVIL PROCEDURE 41(a)(1)(A)(ii)**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs in the actions identified in Exhibit A attached hereto and Defendants Tyco Fire Products LP (“Tyco”), Chemguard, Inc. (“Chemguard”), and ChemDesign Products, Inc. (“ChemDesign”) hereby stipulate and agree to a dismissal with prejudice of all Plaintiffs’ Claims against Tyco, Chemguard, ChemDesign, and any other Released Parties<sup>1</sup> in the actions identified in Exhibit A pursuant to Plaintiffs’ decision to participate in the Settlement Agreement Between Public Water Systems and Tyco dated April 12, 2024 (the “Settlement Agreement”), which received final approval on November 22, 2024, from the Court overseeing *In Re: Aqueous Film-Forming Foams Products Liability Litigation*, MDL No. 2:18-mn-2873 (D.S.C.).

Each party shall bear its own costs.

---

<sup>1</sup> Unless otherwise indicated, all capitalized terms in this motion have the meaning given to them in the Settlement Agreement.

Dated: May 16, 2025

/s/ Scott Summy

Scott Summy  
Cary McDougal  
Carla Burke Pickrel  
Jason Julius  
BARON & BUDD, P.C.  
3102 Oak Lawn Avenue, Suite 1100  
Dallas, TX 75219-4281  
Telephone: (214) 521-3605  
Fax: (214) 523-6600  
ssummy@baronbudd.com  
cmcdougal@baronbudd.com  
cburkepickrel@baronbudd.com  
jjulius@baronbudd.com

*Counsel for Plaintiffs Listed on Exhibit A*

/s/ Brandon Taylor

Brandon Taylor  
Jody Fortunato  
COSSICH SUMICH PARSIOLA  
AND TAYLOR LLC  
8397 Highway 23  
Suite 100  
Belle Chasse, LA 70037  
(504) 394-9000  
btaylor@cossichlaw.com  
jfortunato@cossichlaw.com

*Counsel for Plaintiffs Listed on Exhibit A*

Respectfully submitted,

/s/ David E. Dukes

David E. Dukes  
Nelson Mullins Riley & Scarborough LLP  
1320 Main Street / 17th Floor  
Post Office Box 11070 (29211-1070)  
Columbia, SC 29201  
(803) 799-2000  
david.dukes@nelsonmullins.com

/s/ Liam J. Montgomery

Liam J. Montgomery  
WILLIAMS & CONNOLLY LLP  
680 Maine Ave SW  
Washington, DC 20024  
(202) 434-5000  
lmontgomery@wc.com

*Counsel for Defendants Tyco Fire Products LP  
and Chemguard, Inc.*

/s/ Jonathan B. Blakley

Jonathan B. Blakley  
GORDON REES SCULLY MANSUKHANI  
One North Wacker, Suite 1600  
Chicago, IL 60606  
(312) 619-4915  
jblakley@grsm.com

*Counsel for ChemDesign Products Inc.*